

# Exhibit 1

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

---

**From:** Victor A. Dunlop <moreno@sundree.tv>

**To:** loaww1650@aol.com <loaww1650@aol.com>; Ambrose Wotorson <Wotor1@aol.com>

**Subject:** FW: Jones v. Roc-A-Fella Films, Inc. et al

**Date:** Mon, 4 Feb 2008 4:20 pm

Below please see the first of many delays in receiving discovery responses

...

--

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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----- Forwarded Message

**From:** Stuart Riback <[SRiback@sillerwilk.com](mailto:SRiback@sillerwilk.com)>  
**Date:** Tue, 16 Oct 2007 14:54:45 -0400  
**To:** "Victor A. Dunlop" <[moreno@sundree.tv](mailto:moreno@sundree.tv)>  
**Conversation:** Jones v. Roc-A-Fella Films, Inc. et al  
**Subject:** RE: Jones v. Roc-A-Fella Films, Inc. et al

We'll have them to you in all likelihood by the end of the week.

-----Original Message-----

**From:** Victor A. Dunlop [<mailto:moreno@sundree.tv>]  
**Sent:** Tuesday, October 16, 2007 1:47 PM  
**To:** Stuart Riback  
**Subject:** Jones v. Roc-A-Fella Films, Inc. et al

Dear Stuart:

We have yet to receive your client's initial disclosures. As I am sure this is a slight oversight, please advise us when we can expect to receive them.

Thanks,  
Victor

--

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
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communication cannot be guaranteed.

----- End of Forwarded Message

# **Exhibit 2**

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

Tom J. Ferber  
Mark A. Tamoshunas  
PRYOR CASHMAN LLP  
410 Park Avenue  
New York, NY 10022

Attorneys for Defendant Lions Gate Films, Inc.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
ANTONNE M. JONES,	:
	:
Plaintiff,	:
	:
-against	:
	:
ROC-A-FELLA FILMS, INC., LIONS GATE	:
FILMS, INC., DAMON DASH and	:
SHAWN CARTER,	:
	:
Defendants.	:
-----X	

07 Civ. 3648 (KNF)

**DEFENDANT LIONS GATE FILMS, INC.'S  
OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Lions Gate Films, Inc.'s ("Lions Gate" or "Defendant"), by its attorneys Pryor Cashman LLP, herein responds to Plaintiff's First Request for Production of Documents (the "Requests") as follows:

**GENERAL OBJECTIONS**

In addition to the Specific Objections separately set forth below, Defendant makes the following General Objections to the Requests:

A. Defendant objects to the Requests to the extent that they seek impermissibly to expand the scope of discovery or impose obligations beyond those permitted by the Federal Rules of Civil Procedure ("FRCP"), this Court's Local Civil Rules and relevant case law.

B. Defendant objects to Plaintiff's Instructions and Definitions to the Requests to the extent that they are overbroad and unduly burdensome.

C. Defendant objects to the Requests to the extent that they seek production of documents that are not relevant to any claim or defense in this action.

D. Defendant objects to the Requests to the extent they seek documents or information that are protected by the attorney-client privilege or constitute attorney work product or were prepared in anticipation of litigation or for trial or are otherwise protected from disclosure from any other privilege or immunity such as a joint defense agreement. To the extent that Defendant produces any documents in response to the Requests, said production will consist only of non-privileged and non-protected documents.

E. Defendant objects to the Requests to the extent they seek documents containing confidential or proprietary business information in the absence of a suitable protective order.

F. Defendant objects to the Requests to the extent that they may be construed to seek the production of documents in the possession, custody or control of individuals or entities other than Defendant, and to the extent they may be construed to require any search for documents beyond one that is limited to the appropriate subject matter files pertinent to the Requests and to the personal files of Defendant or its employees, agents or representatives known or reasonably believed to have personal involvement in, or knowledge of, the subjects included within the Requests.

G. By not objecting to any particular Request, Defendant does not concede, imply or admit that any documents responsive to such Request exist.

H. Defendant submits these responses without conceding the relevance or materiality of the subject matter of any document or document requested by the Requests. By producing

any documents or by providing a response to any particular Request, Defendant does not concede that such document(s) are admissible or relevant. Defendant reserves the right to object to the admissibility of any and all documents that it produces.

I. By responding to any particular Request, Defendant does not acknowledge or concede that the facts set forth in, or the predicate underlying, such Request are accurate or truthful in any respect.

J. Inadvertent production of any document, which is confidential or which contains confidential or proprietary information or is privileged, or was prepared in anticipation of litigation or for trial, shall not constitute a waiver of any privilege or of any other ground for objection to discovery with respect to such document, the information contained herein, or the subject matter thereof, or of Defendant's rights to object to the use of such document or the information contained therein during the trial of this matter.

K. Defendant reserves the right to modify and supplement its responses and objections to the Requests.

### **SPECIFIC RESPONSES AND OBJECTIONS**

Subject to the above General Objections, which apply to each Request as if set forth fully below, Defendant makes the specific responses and objections set forth below.

#### **REQUEST NO. 1**

All documents relating to any and all correspondence between LGF on the one hand and RAF, Dash, Carter and/or Rotholz on the other hand in connection with State Property and State Property 2.

**RESPONSE NO. 1**

In addition to the foregoing General Objections, Defendant objects to this request on the ground that it is overly broad to the extent that it seeks irrelevant documents. Subject to and without waiver of the foregoing objections, Defendant will produce documents responsive to this request after the entry of an appropriate protective order in this case.

**REQUEST NO. 2**

A copy of each and every written contract between LGF on the one hand and RAF, Dash, Carter and/or Rotholz on the other hand in connection with State Property and State Property 2.

**RESPONSE NO. 2**

In addition to the foregoing General Objections, Defendant objects to this request on the ground that it is overly broad to the extent that it seeks irrelevant documents. Subject to and without waiver of the foregoing objections, Defendant will produce documents responsive to this request after the entry of an appropriate protective order in this case.

**REQUEST NO. 3**

All advertising and promotional materials used by LGF in connection with State Property and State Property 2.

**RESPONSE NO. 3**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and seeks irrelevant documents.

**REQUEST NO. 4**

All documents concerning each and every occasion and the date(s) thereof on which State Property and/or State Property 2 were shown in movie theatres throughout the World.



**RESPONSE NO. 4**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome, unduly vague and seeks irrelevant documents to the extent that this request seeks documents "concerning" each and every occasion State Property and State Property 2 were shown and seeks documents detailing such showings outside the United States. Subject to and without waiver of the foregoing objections, Defendant will produce summaries detailing the dates State Property and State Property 2 were shown in the United States, to the extent that such documents exist, after the entry of an appropriate protective order in this case.

**REQUEST NO. 5**

All documents concerning any and all correspondence between LGF and/or LGHE and RAF, Dash, Carter, and/or Rotholz for any digital video-disc ("DVD") distribution of State Property and/or State Property 2 throughout the World.

**RESPONSE NO. 5**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome, unduly vague and seeks irrelevant documents to the extent that this request seeks documents "concerning any and all correspondence" and seeks documents relating to DVD distribution outside the United States. Subject to and without waiver of the foregoing objections, Defendant will produce documents responsive to this request which relate to DVD distribution within the United States after the entry of an appropriate protective order in this case.

**REQUEST NO. 6**

A copy of each and every written contract and/or agreement between LGF and/or LGHE on the one hand and RAF, Dash, Carter and/or Rotholz on the other hand for any DVD distribution of State Property and/or State Property 2 throughout the World.

**RESPONSE NO. 6**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and seeks irrelevant documents to the extent that this request seeks documents relating to DVD distribution outside the United States. Subject to and without waiver of the foregoing objections, Defendant will produce documents responsive to this request which relate to DVD distribution within the United States after the entry of an appropriate protective order in this case.

**REQUEST NO. 7**

All documents concerning LGF's ownership in the copyrights to State Property and/or State Property 2.

**RESPONSE NO. 7**

Subject to and without waiver of the foregoing objections, Defendant will produce documents responsive to this request.

**REQUEST NO. 8**

All documents concerning LGF's communications with the United States Copyright Office in connection with State Property and/or State Property 2.

**RESPONSE NO. 8**

Subject to and without waiver of the foregoing objections, Defendant will produce documents responsive to this request.

**REQUEST NO. 9**

All documents concerning Anderson and/or Abbott and any communication LGF had with either concerning State Property and/or State Property 2.

**RESPONSE NO. 9**

In addition to the foregoing General Objections, Defendant objects to this request on the ground that it is unduly vague to the extent that it seeks documents "concerning" Anderson and/or Abbott. Subject to and without waiver of the foregoing objections, Defendant will produce any agreements and correspondence with Anderson and/or Abbott responsive to this request after the entry of an appropriate protective order.

**REQUEST NO. 10**

All documents relating to the distribution of State Property and/or State Property 2 in DVD format.

**RESPONSE NO. 10**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and seeks irrelevant documents to the extent that this request seeks documents relating to DVD distribution outside the United States. Subject to and without waiver of the foregoing objections, Defendant will produce producer's statements reflecting financial performance within the United States after the entry of an appropriate protective order in this case.

**REQUEST NO. 11**

All documents relating to payments received by LGF for the distribution, sale and/or rental of State Property and/or State Property 2 throughout the World.

**RESPONSE NO. 11**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and seeks irrelevant documents to the extent that this request seeks documents relating to payment for DVD distribution outside the United States. Subject to and without waiver of the foregoing objections, Defendant will produce producer's statements reflecting financial performance of DVD sales and/or rentals within the United States after the entry of an appropriate protective order in this case.

**REQUEST NO. 12**

All documents relating to payments made by LGF to RAF, Dash, Carter and/or Rotholz including without limitation, all advances and royalties, in connection with State Property and/or State Property 2.

**RESPONSE NO. 12**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome, unduly vague and seeks irrelevant documents to the extent that this request seeks "all documents relating to payments" made by Lions Gate. Subject to and without waiver of the foregoing objections, Defendant will produce documents sufficient to demonstrate all payments made to RAF, Dash Carter and/or Rotholz in connection with State Property and/or State Property 2 after the entry of an appropriate protective order in this case.

**REQUEST NO. 13**

All documents relating to payments made by third parties to LGF concerning State Property and/or State Property 2.

**RESPONSE NO. 13**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and seeks irrelevant documents to the extent that this request seeks "all documents relating to payments made by third parties." Subject to and without waiver of the foregoing objections, Defendant will produce summaries demonstrating the payments made by third parties after the entry of an appropriate protective order in this case.

**REQUEST NO. 14**

All documents concerning any written communication amongst Defendants (including non-parties Anderson and/or Abbott) with respect to the subject matter of the Complaint.

**RESPONSE NO. 14**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is unduly vague to the extent it seeks communications "with respect to the subject matter of the Complaint." Defendant further objects to this request to the extent that it seeks communications between Lions Gate and/or Defendants Dash, RAF or Carter after Lions Gate agreed to be governed by a joint defense agreement with those parties. Subject to and without waiver of the foregoing objections, Defendant will produce all non-privileged or protected documents responsive to this request.

**REQUEST NO. 15**

All documents memorializing any meetings and/or telephone conversation amongst Defendants (including non-parties Anderson and Abbott) concerning the subject matter of the Complaint.

**RESPONSE NO. 15**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is unduly vague to the extent it seeks documents memorializing any meetings and/or telephone conversations “concerning the subject matter of the Complaint.” Defendant further objects to this request to the extent that it seeks communications between Lions Gate and/or Defendants Dash, RAF or Carter after Lions Gate agreed to be governed by a joint defense agreement with those parties. Subject to and without waiver of the foregoing objections, Defendant will produce all non-privileged or protected documents responsive to this request.

**REQUEST NO. 16**

All documents used or consulted in preparing the answers to Plaintiff's First Set of Interrogatories.

**RESPONSE NO. 16**

Subject to and without waiver of the foregoing objections, Defendant will produce all non-privileged or protected documents responsive to this request.

**REQUEST NO. 17**

To the extent not covered by these Requests, all other documents concerning State Property and State Property 2 or any other issues raised instant action.

**RESPONSE NO. 17**

In addition to the foregoing General Objections, Defendant objects to this request on the grounds that it is unduly burdensome, seeks irrelevant documents and is unduly vague to the extent it seeks documents “concerning State Property and State Property 2 or any other issues raised [sic] instant action.” Defendant further objects to this request to the extent that it is duplicative of other requests.

Dated: New York, New York  
November 9, 2007

PRYOR CASHMAN LLP

By: 

Tom J. Ferber  
Mark A. Tamoshunas  
410 Park Avenue  
New York, New York 10022  
(212) 421-4100

*Attorneys for Defendant Lions Gate Films, Inc.*

To: Victor A. Dunlop  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
*Attorneys for Plaintiff Antonne M. Jones*

Tom J. Ferber  
Mark A. Tamoshunas  
PRYOR CASHMAN LLP  
410 Park Avenue  
New York, NY 10022

Attorneys for Defendant Lions Gate Films, Inc.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
ANTONNE M. JONES,	:
	:
Plaintiff,	:
	:
-against	:
	:
ROC-A-FELLA FILMS, INC., LIONS GATE	:
FILMS, INC., DAMON DASH and	:
SHAWN CARTER,	:
	:
Defendants.	:
-----X	

07 Civ. 3648 (KNF)

**DEFENDANT LIONS GATE FILMS, INC.'S  
OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Lions Gate Films, Inc.'s ("Lions Gate" or "Defendant"), by its attorneys Pryor Cashman LLP, herein responds to Plaintiff's First Set of Interrogatories (the "Interrogatories") as follows:

**GENERAL OBJECTIONS**

In addition to the specific objections separately set forth below, Defendant makes the following General Objections to the Interrogatories:

A. Defendant objects to Plaintiff's Interrogatories to the extent that they seek impermissibly to expand the scope of discovery or impose obligations beyond those permitted by the Federal Rules of Civil Procedure ("FRCP"), this Court's Local Rules and Practices and other relevant authorities.



B. Defendant objects to Plaintiff's Instructions and Definitions to the Interrogatories to the extent that the Definitions and Instructions are overly broad and unduly burdensome.

C. Defendant objects to Plaintiff's Interrogatories to the extent that they seek information that is not relevant to any claim or defense in this action.

D. Defendant objects to Plaintiff's Interrogatories to the extent that they seek information protected by the attorney-client privilege, the work product doctrine, or any other privilege or immunity from discovery, including information shared pursuant to a joint defense agreement. Such information will not be provided.

E. By providing a response to any particular Interrogatory, Defendant does not concede that such response(s) are admissible or relevant, and Defendant reserves the right to object to the admissibility of any and all information that it produces.

F. By responding to any particular Interrogatory, Defendant does not acknowledge or concede that the facts set forth in, or the predicate underlying, such Interrogatory is accurate or truthful in any respect.

G. In responding to any particular Interrogatory, Defendant is referring to "State Property" as the film with that title, but is not including the film "State Property 2" in that reference.

H. Defendant reserves the right to modify and supplement its responses and objections to Plaintiff's Interrogatories.

Subject to these General Objections, Defendant's specific objections and responses are set forth below.

**INTERROGATORY NO. 1**

Identify each person with knowledge or information concerning any agreements, whether oral or written, between Defendants in connection with or concerning State Property.

**RESPONSE NO. 1**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and unduly vague to the extent that it seeks every individual with knowledge concerning unspecified "agreements" between Lions Gate and any of the other Defendants. Subject to and without waiver of the foregoing objections, Defendant states that Michael Paseornek, Laurie May and Wayne Levin are the individuals at Lions Gate with the most knowledge on the agreements between Defendants concerning State Property.

**INTERROGATORY NO. 2**

Identify each person employed by or acting on behalf of LGF in connection with any agreements, whether oral or written, between Defendants Damon Dash, Roc-A-Fella Films, Inc., Shawn Carter and/or non-party RCB Entertainment, Inc. on the one hand and LGF on the other hand.

**RESPONSE NO. 2**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, unduly vague and seeks information irrelevant to this action to the extent that it seeks every individual with knowledge concerning unspecified "agreements" between Lions Gate and any of the other Defendants. Subject to and

without waiver of the foregoing objections, Defendant states that Michael Paseornek, Laurie May and Wayne Levin are the individuals at Lions Gate with the most knowledge on the production of State Property.

**INTERROGATORY NO. 3**

Identify the officers, executives or employees of LGF involved in the decision to contract with Defendants Damon Dash, Shawn Carter and/or Roc-A-Fella Films, Inc. to distribute State Property.

**RESPONSE NO. 3**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, unduly vague and seeks information irrelevant to this action to the extent that it seeks every individual involved in the decision to distribute State Property. Subject to and without waiver of the foregoing objections, Defendant states that, while various high level executives are involved at Lions Gate in the determination to distribute State Property, Michael Paseornek, Laurie May and Wayne Levin are the individuals at Lions Gate with the most knowledge as to the agreements to distribute State Property.

**INTERROGATORY NO. 4**

Identify each person with knowledge or information concerning each and every occasion and the date(s) thereof on which LGF conferred with, met with or worked with Defendants Damon Dash, Shawn Carter and/or Roc-A-Fella Films, Inc. with respect to the subject matter of the Complaint.

**RESPONSE NO. 4**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, unduly vague and seeks information irrelevant to this action to the extent it seeks every individual at Lions Gate with knowledge of

met or worked with Defendants “with respect to the subject matter of the Complaint” and seeks the specific dates for each such occasion. Subject to and without waiver of the foregoing objections, Defendant states that Michael Paseornek is the individual at Lions Gate with the most knowledge of meetings between Lions Gate and any of the other Defendants relating to State Property.

**INTERROGATORY NO. 5**

Identify each person with knowledge or information concerning any communications, whether oral or written, between LGF and Defendants Damon Dash and/or Roc-A-Fella Films, Inc. with respect to the subject matter of the Complaint.

**RESPONSE NO. 5**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, unduly vague and seeks information irrelevant to this action to the extent it seeks every individual at Lions Gate with knowledge or information concerning any communications between Lions Gate and Defendants “with respect to the subject matter of the Complaint.” Subject to and without waiver of the foregoing objections, Defendant states that Michael Paseornek is the individual at Lions Gate with the most knowledge of communications between Lions Gate and any of the other Defendants relating to State Property.

**INTERROGATORY NO. 6**

Identify each person employed by or acting on behalf of LGF that is most knowledgeable about Plaintiff's Copyrights in and to The Family.

**RESPONSE NO. 6**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the ground that it seeks information irrelevant to this action to the extent that it seeks individuals that are aware of Plaintiff's claimed copyrights in The Family solely as a result of this action. Subject to and without waiver of the foregoing objections, Defendant states that there are no individuals at Lions Gate with knowledge of Plaintiff's claimed copyrights in The Family.

**INTERROGATORY NO. 7**

Identify each person employed by or acting on behalf of LGF that is most knowledgeable about The Family.

**RESPONSE NO. 7**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the ground that it seeks information irrelevant to this action to the extent that it seeks individuals that are aware of The Family solely as a result of this action. Subject to and without waiver of the foregoing objections, Defendant states that there are no individuals at Lions Gate knowledgeable about The Family.

**INTERROGATORY NO. 8**

Identify each person with knowledge or information concerning any meetings and/or telephone conversations between LGF and Defendants (inclusive of non-parties Anderson and/or Abbot) with respect to the subject matter of the Complaint.

**RESPONSE NO. 8**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, unduly vague, duplicative of

Interrogatory No. 5 and seeks information irrelevant to this action to the extent it seeks every individual at Lions Gate with knowledge or information concerning any communications between Lions Gate and Defendants "with respect to the subject matter of the Complaint."

Subject to and without waiver of the foregoing objections, Defendant states that Michael Paseornek is the individual at Lions Gate with the most knowledge of communications between Lions Gate and any of the Defendants as well as non-parties Anderson and/or Abbot, to the extent that there were any such communications, relating to the creation of State Property.

**INTERROGATORY NO. 9**

Identify each person with knowledge or information concerning any insurance claim for coverage tendered by Defendants with respect to the subject matter in the Complaint.

**RESPONSE NO. 9**

In addition to the foregoing General Objections, Defendant objects to this request to the extent that it seeks information regarding insurance claims which may have been made by other Defendants in this action. Subject to and without waiver of the foregoing objections, Defendant states that James Gladstone is the individual at Lions Gate with the most knowledge concerning any insurance claim for coverage tendered by Lions Gate with respect to the claims asserted in the Complaint.

**INTERROGATORY NO. 10**

Identify each person who has furnished information or otherwise assisted in the preparation of an answer to one or more of these interrogatories and identify each specific answer or answers for which each such person provided information or other assistance.

**RESPONSE NO. 10**

Subject to and without waiver of the foregoing General Objections, Defendant states that James Gladstone has assisted in the preparation of each of each of the answers to Plaintiff's Interrogatories with the assistance of Lions Gate's counsel, Pryor Cashman.

**INTERROGATORY NO. 11**

Identify each person with knowledge of each document that Defendants intend to introduce into evidence in this proceeding, and each and every document upon which Defendants have relied in responding to the foregoing Interrogatories.

**RESPONSE NO. 11**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is beyond the scope of FRCP 26 and Civil Local Rule 33.3 and is also premature. Subject to and without waiver of the foregoing objections, Defendant states that it will produce any documents upon which it relied in responding to the foregoing interrogatories.

**INTERROGATORY NO. 12**

Identify each person assisting in the preparation of the response to Plaintiff's First Request for Production of Documents, and with respect thereto, set forth the following:

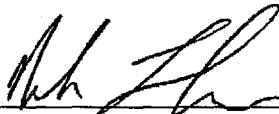
- (a) Full name and address:
- (b) Employer and employment position; and
- (c) Date and location where she/he supplied the information responding to the document request.

**RESPONSE NO. 12**

In addition to the foregoing General Objections, Defendant objects to this interrogatory on the grounds that it is beyond the scope of FRCP 26 and Civil Local Rule 33.3. Subject to and without waiver of the foregoing objections, Defendant states that James Gladstone, Executive Vice President, Business and Legal Affairs, at Lions Gate assisted in the response to Plaintiff's First Request for the Production of Documents.

Dated: New York, New York  
November 9, 2007

PRYOR CASHMAN LLP

By:   
Tom J. Ferber  
Mark A. Tamoshunas  
410 Park Avenue  
New York, New York 10022  
(212) 421-4100

*Attorneys for Defendant Lions Gate Films, Inc.*

To: Victor A. Dunlop  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
*Attorneys for Plaintiff Antonne M. Jones*



Tom J. Ferber  
Mark A. Tamoshunas  
PRYOR CASHMAN LLP  
410 Park Avenue, 10<sup>th</sup> Floor  
New York, New York 10022  
(212) 421-4100

Attorneys for Defendant Lions Gate Films, Inc.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ANNTONE M. JONES

Plaintiff,

v.

:  
:  
07 Civ. 3648 (KNF)

ROC-A-FELLA FILMS, INC., LIONS GATE  
FILMS, INC., DAMON DASH and  
SHAWN CARTER

Defendants.

:  
-----X

**CERTIFICATE OF SERVICE**

I, Mark A. Tamoshunas, an associate at Pryor Cashman LLP and a member of the bar of the Southern District of New York, do hereby certify that on the 9th day of November 2007, I caused to be served a true copy of Defendant Lion Gate Films, Inc.'s Objections and Responses to Plaintiff's First Request For Production of Documents and Objections and Responses to Plaintiff's first set of Interrogatories by First class mail delivery upon:

Victor A. Dunlop  
Dunlop & Associates, P.C.  
55 Washington Street, 451  
Brooklyn, New York 11201  
Attorneys for Plaintiff

Damon Dash  
Dash Enterprises I, LLC  
25 W. 39<sup>th</sup> St., 14<sup>th</sup> Floor  
New York, NY 10018

Stuart M. Riback  
Siller Wilk LLP  
675 Third Avenue  
New York, New York 10017  
Attorneys for Defendant Shawn Carter

Dated: New York, New York  
November 9, 2007

A handwritten signature in black ink, appearing to read 'Mark A. Tamoshun', is written over a horizontal line.

Mark A. Tamoshun

# **Exhibit 3**

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

**From:** Victor A. Dunlop <moreno@sundree.tv>  
**To:** loaww1650@aol.com <loaww1650@aol.com>; Ambrose Wotorson <Wotor1@aol.com>  
**Subject:** FW: Jones v. Lion's Gate Films et al  
**Date:** Mon, 4 Feb 2008 4:01 pm  
**Attachments:** Accuroute.PDF (190K), Accuroute.PDF (532K)

Attached is the protective order that was circulated by Pryor Cashman in last August ... As a direct result of Dash firing his attorneys in mid September, the signing of the order was delayed until its execution on November 16 - Also the discovery responses were due on or about November 3rd and they did not include any documents - I received the first set of documents from Pryor Cashman on or about December 18th and the final set in the first week of January 2008 ...

--

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
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Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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----- Forwarded Message

From: "Tamoshunas, Mark A." <[MTamoshunas@PRYORCASHMAN.com](mailto:MTamoshunas@PRYORCASHMAN.com)>  
Date: Fri, 16 Nov 2007 19:33:22 -0500  
To: "Victor A. Dunlop" <[moreno@sundree.tv](mailto:moreno@sundree.tv)>  
Cc: "Ferber, Tom J." <[TFerber@PRYORCASHMAN.com](mailto:TFerber@PRYORCASHMAN.com)>, <[sriback@sillerwilk.com](mailto:sriback@sillerwilk.com)>  
Conversation: Jones v. Lion's Gate Films et al  
Subject: Jones v. Lion's Gate Films et al

Victor-

As you requested, attached please find the executed Protective Order. Also attached please find a courtesy copy of the discovery responses we had mailed last Friday.  
Very truly yours,  
Mark

Mark A. Tamoshunas  
Pryor Cashman LLP  
410 Park Avenue  
New York, New York 10022  
Tel (212) 326-0438  
Fax (212) 798-6932

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply email to [mtamoshunas@pryorcashman.com](mailto:mtamoshunas@pryorcashman.com), and delete the message. Thank you very much..

-----Original Message-----

From: Victor A. Dunlop [mailto:[moreno@sundree.tv](mailto:moreno@sundree.tv)]  
Sent: Tuesday, November 13, 2007 7:51 PM  
To: Tamoshunas, Mark A.; Stuart Riback  
Subject: Jones v. Lion's Gate Films et al

Dear Mark:

Please see the attached.

Regards,  
Victor Dunlop

--  
Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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---

IRS Circular 230 disclosure:

To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that any U.S. tax advice contained in this communication (including attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or applicable provisions of state and local tax law or (ii) promoting, marketing, or recommending to another party any transaction or matter addressed herein.

----- End of Forwarded Message

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANTONNE M. JONES,

Plaintiff,

V.

ROC-A-FELLA FILMS, INC., LIONS GATE  
FILMS, INC., DAMON DASH and  
SHAWN CARTER,

**Defendants.**

07 Civ. 3648 (KNF)

**STIPULATION AND  
PROTECTIVE ORDER**

All the parties to this action having stipulated to the following provisions and having requested that the Court issue a protective order pursuant to Fed. R. Civ. P. 26(c) to protect the confidentiality of non-public and competitively-sensitive information that may need to be disclosed to adversary parties in connection with discovery in this case, and the parties having consented to the form of this Order, and the Court having found that good cause exists for issuance of an appropriately tailored confidentiality order governing the pretrial phase of this action, it is hereby

ORDERED that any person subject to this Order -- including without limitation the parties to this action, their representatives, agents, experts and consultants, all third parties providing discovery in this action, and all other interested persons with actual or constructive notice of this Order -- shall adhere to the following terms, upon pain of contempt:

1. Any person subject to this Order who receives from any other person any information of any kind provided in the course of discovery in the action ("Discovery Material") that is designated as "Confidential" pursuant to the terms of this Order (hereinafter the "Confidential Information") shall not disclose such Confidential Information to anyone else except as expressly permitted hereunder.

2. The person disclosing or producing any given Discovery Material may designate as Confidential only such portion of such material as consists of:

- (a) any information of a personal or intimate nature regarding any individual;
- (b) any commercially sensitive and/or confidential business or financial information (including without limitation nonpublic contracts, profitability reports or estimates, percentage fees, royalty rates, minimum guarantee payments, payments to writers, sales reports, sales margins, and business or financial information that may be confidential, proprietary or commercially sensitive to certain third parties who have had dealings with parties to this action);
- (c) any business plans, product development information or marketing plans;

or

(d) any other category of material or information hereinafter given Confidential status by the Court.

3. Any person subject to this Order who receives from any other person any Discovery Material that is designated as "Attorneys' Eyes Only" pursuant to the terms of this Order shall not disclose such Attorneys' Eyes Only material or information to anyone else except as expressly permitted hereunder.

4. The person producing any given Discovery Material may designate as Attorneys' Eyes Only only such portion of such material or information which it in good faith believes the disclosure of which is likely to be harmful to the ability of the producing party and/or its affiliates to conduct business in a competitive fashion and consists of:

- (a) any commercially sensitive and/or confidential business or financial information (including without limitation nonpublic contracts, profitability reports or estimates, percentage fees, royalty rates, minimum guarantee payments, sales reports, sales margins, and

business or financial information that may be confidential, proprietary or commercially sensitive to certain third parties who have had dealings with parties to this action);

(b) any business plans, product development information or marketing plans;

or

(c) any other category of material or information hereinafter given Attorneys'

Eyes Only status by the Court.

5. With respect to the Confidential or Attorneys' Eyes Only portion(s) of any Discovery Material other than deposition transcripts and exhibits, the producing person or that person's counsel may designate such portion(s) as "Confidential" or as "Attorneys' Eyes Only" by stamping or otherwise clearly marking as "Confidential" or as "Attorneys' Eyes Only" the protected portion(s) in a manner that will not interfere with legibility or audibility, and by also producing for future public use another copy of said Discovery Material with the Confidential or Attorneys' Eyes Only information redacted. With respect to deposition transcripts and exhibits, a producing person or that person's counsel may indicate on the record that a question calls for Confidential Information or Attorneys' Eyes Only information, in which case the transcript of the designated testimony shall be bound in a separate volume and marked "Confidential Information Governed by Protective Order" or "Attorneys' Eyes Only Information Governed by Protective Order," as the case may be, by the reporter.

6. If at any time prior to the trial of this action, a producing person realizes that some portion(s) of Discovery Material that that person previously produced without limitation should be designated as Confidential or as Attorneys' Eyes Only, he may so designate by so apprising all parties in writing, and such designated portion(s) of the Discovery Material will thereafter be treated as Confidential or as Attorneys' Eyes Only under the terms of this Order.



7. No person subject to this Order other than the producing person shall disclose any of the Discovery Material designated by the producing person as Confidential to any other person whomsoever, except to:

- (a) the parties to this action;
  - (b) counsel retained specifically for this action, including any paralegal, clerical and other assistant employed by such counsel and assigned to this matter;
  - (c) as to any document, its author, its addressee, and any other person indicated on the face of the document as having received a copy;
  - (d) any witness who counsel for a party in good faith believes may be called to testify at trial or deposition in this action, provided such person has first executed a Non-Disclosure Agreement in the form annexed as an Exhibit hereto;
  - (e) any person retained by a party to serve as an expert witness or otherwise provide specialized advice to counsel in connection with this action, provided such person has first executed a Non-Disclosure Agreement in the form annexed as an Exhibit hereto;
  - (f) stenographers engaged to transcribe depositions conducted in this action;
- and
- (g) the Court and its support personnel.

8. No person subject to this Order other than the producing person shall disclose any of the Discovery Material designated by the producing person as Attorneys' Eyes Only to any other person whomsoever, except to:

- (a) counsel retained specifically for this action or in-house counsel;
- (b) as to any document, its author, its addressee, and any other person indicated on the face of the document as having received a copy;

(c) stenographers engaged to transcribe depositions conducted in this action;  
and

(d) the Court and its support personnel.

9. Prior to any disclosure of any Confidential Discovery Material to any person referred to in subparagraphs 7(d) or 7(e) above, such person shall be provided by counsel with a copy of this Protective Order and shall sign a Non-Disclosure Agreement in the form annexed as an Exhibit hereto, stating that that person has read this Order and agrees to be bound by its terms. Said counsel shall retain each signed Non-Disclosure Agreement, hold it in escrow, and produce it to opposing counsel either prior to such person being permitted to testify (at deposition or trial) or at the conclusion of the case, whichever comes first.

10. All Confidential and Attorneys' Eyes Only material filed with the Court, and all portions of pleadings, motions or other papers filed with the Court that disclose such Confidential or Attorneys' Eyes Only material, shall be filed under seal with the Clerk of the Court and kept under seal until further order from the Court. The parties will use their best efforts to minimize such sealing.

11. Any party who either objects to any designation of confidentiality, or who, by contrast, requests still further limits on disclosure (such as prior *in camera* review in extraordinary circumstances), may at any time prior to the trial of this action serve upon counsel for the designating person a written notice stating with particularity the grounds of the objection or request. If agreement cannot be reached promptly, counsel for all affected persons will convene a joint telephone call with the Court to obtain a ruling.

12. Each person who has access to Discovery Material that has been designated as Confidential or as Attorneys' Eyes Only shall take all due precautions to prevent the unauthorized or inadvertent disclosure of such material.

13. This Protective Order shall survive the termination of the litigation. Within 30 days of the final disposition of this action, all Discovery Materials designated as "Confidential" and as "Attorneys' Eyes Only," and all copies thereof, shall be promptly returned to the producing person, or, upon permission of the producing person, destroyed.

14. This Stipulation and Protective Order may be executed in counterparts and facsimile signatures shall be deemed to be originals.

15. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

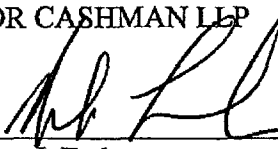
Dated: New York, New York  
November 14 2007

DUNLOP & ASSOCIATES, P.C.

By: \_\_\_\_\_  
Victor A. Dunlop  
Kenneth J. Montgomery  
Craig L. Davidowitz

55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261  
Attorneys for Plaintiff Antonne M. Jones

PRYOR CASHMAN LLP

By:   
Tom J. Ferber  
Mark A. Tamoshunas

410 Park Avenue  
New York, NY 10022  
(212) 421-4100  
Attorneys for Defendant Lions Gate Films, Inc.

SILLER WILK LLP

\_\_\_\_\_  
Damon Dash

By: \_\_\_\_\_  
Stuart M. Riback  
675 Third Avenue  
New York, NY 10017  
Attorneys for Defendant  
Shawn Carter

SO ORDERED.

\_\_\_\_\_  
KEVIN N. FOX, U.S.M.J.

[EXHIBIT]

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
ANTONNE M. JONES	:	
Plaintiff,	:	07 Civ. 3648 (KNF)
	:	
v.	:	
ROC-A-FELLA FILMS, INC., LIONS GATE	:	
FILM, INC., DAMON DASH and	:	<u>Non-Disclosure Agreement</u>
SHAWN CARTER	:	
	:	
Defendants.	:	
-----X		

I, \_\_\_\_\_, acknowledge that I have read and understand the Protective Order in this action governing the non-disclosure of those portions of Discovery Material that have been designated as Confidential. I agree that I will not disclose such Confidential Discovery Material to anyone other than for purposes of this litigation and that at the conclusion of the litigation I will return all discovery information to the party or attorney from whom I received it. By acknowledging these obligations under the Protective Order, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder and that my willful violation of any term of the Protective Order could subject me to punishment for contempt of Court.

Dated: \_\_\_\_\_

# **Exhibit 4**

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

**From:** Victor A. Dunlop <moreno@sundree.tv>  
**To:** loaww1650@aol.com <loaww1650@aol.com>; Ambrose Wotorson <Wotor1@aol.com>  
**Subject:** FW: Jones v. Roc-A-Fella Films, Inc et al  
**Date:** Mon, 4 Feb 2008 4:25 pm

Please read the exchange below.

--

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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----- Forwarded Message  
**From:** Stuart Riback <[SRiback@sillerwilk.com](mailto:SRiback@sillerwilk.com)>  
**Date:** Mon, 3 Dec 2007 13:09:53 -0500  
**To:** <[moreno@sundree.tv](mailto:moreno@sundree.tv)>  
**Conversation:** Jones v. Roc-A-Fella Films, Inc et al  
**Subject:** RE: Jones v. Roc-A-Fella Films, Inc et al

I have received the protective order and will be turning to it shortly.

-----Original Message-----  
**From:** [moreno@sundree.tv](mailto:moreno@sundree.tv) [<mailto:moreno@sundree.tv>]  
**Sent:** Monday, December 03, 2007 10:32 AM  
**To:** Stuart Riback  
**Subject:** RE: Jones v. Roc-A-Fella Films, Inc et al

Dear Stuart:

Tank you for the update. However, unless we receive substantive responses to our outstanding discovery demands that we due on Nov. 6 and promised by you on Nov. 9 by Dec. 6, we will request a motion conference to move under Rule 37. Also, have you received and/or executed LGF's protective order?

I look forward to hearing from you.

Regards,  
Victor Dunlop

> I have been swamped with a prelim injunc hearing since early this  
> month which is why you haven't heard from me. I expect to return to  
> thus case later this week.  
>  
> Stuart  
>  
>  
> Sent from my GoodLink synchronized handheld ([www.good.com](http://www.good.com))  
>

> -----Original Message-----

> From: Victor A. Dunlop [mailto:[moreno@sundree.tv](mailto:moreno@sundree.tv)]

> Sent: Tuesday, November 06, 2007 05:40 PM Eastern Standard Time

> To: Stuart Riback

> Subject: Jones v. Roc-A-Fella Films, Inc et al

>

> Dear Stuart:

>

> Please see the attached.

>

>

> Regards,

> Victor Dunlop

> --

> Victor A. Dunlop, Esq.

> Dunlop & Associates, P.C.

> 55 Washington Street, Suite 451

> Brooklyn, New York 11201

> (718) 403-9261 Telephone

> (614) 455-9261 Facsimile

> [www.sundree.tv](http://www.sundree.tv)

>

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> attachments can be altered electronically, the integrity of this  
> communication cannot be guaranteed.

>

>

--

Dunlop & Associates, P.C.

Victor Antonio Dunlop, Esq.

55 Washington Street, Suite 451

Brooklyn, New York 11201

(718) 403-9261 Telephone

(614) 455-9261 Facsimile

----- End of Forwarded Message



# **Exhibit 5**

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

**From:** Victor A. Dunlop <moreno@sundree.tv>  
**To:** loaww1650@aol.com <loaww1650@aol.com>; Ambrose Wotorson <Wotor1@aol.com>  
**Subject:** FW: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007  
**Date:** Mon, 4 Feb 2008 4:19 pm

Please read below.

--  
Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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----- Forwarded Message  
From: Stuart Riback <[SRiback@sillerwilk.com](mailto:SRiback@sillerwilk.com)>  
Date: Fri, 7 Dec 2007 13:50:38 -0500  
To: "Victor A. Dunlop" <[moreno@sundree.tv](mailto:moreno@sundree.tv)>  
Conversation: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007  
Subject: RE: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007

Let me have a chance to eyeball the protective order again - I haven't had a chance since I last gave comments, but I doubt there will be a problem - and once I sign it I'll send the docs. The docs are on my desk. I do apologize, but my post-hearing brief on this preliminary injunction is going in on Monday, and I have not been able to think about much else. I should be much more accessible next week.

-----Original Message-----  
From: Victor A. Dunlop [<mailto:moreno@sundree.tv>]  
Sent: Friday, December 07, 2007 1:49 PM  
To: Stuart Riback  
Subject: Re: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007

Stuart,

I spoke with Bessie. I look forward to receiving your responses as well as the documents.

Regards,  
Victor

On 12/6/07 8:49 PM, "Stuart Riback" <[SRiback@sillerwilk.com](mailto:SRiback@sillerwilk.com)> wrote:

> Victor, I expect to have some stuff for you tomorrow.

>

> -----Original Message-----

> From: Victor A. Dunlop [<mailto:moreno@sundree.tv>]

> Sent: Wednesday, December 05, 2007 5:57 PM

> To: Tamoshunas, Mark A.; Stuart Riback

> Subject: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007

>

# **Exhibit 6**

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

**From:** Victor A. Dunlop <moreno@sundree.tv>

**To:** loaww1650@aol.com <loaww1650@aol.com>; Ambrose Wotorson <Wotor1@aol.com>

**Subject:** FW: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007

**Date:** Mon, 4 Feb 2008 4:20 pm

Please read below.

--

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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----- Forwarded Message

**From:** Stuart Riback <[SRiback@sillerwilk.com](mailto:SRiback@sillerwilk.com)>  
**Date:** Fri, 7 Dec 2007 15:09:59 -0500  
**To:** "Victor A. Dunlop" <[moreno@sundree.tv](mailto:moreno@sundree.tv)>  
**Cc:** Emma Daschbach <[edaschbach@sillerwilk.com](mailto:edaschbach@sillerwilk.com)>  
**Conversation:** Jones v. Roc-A-Fella Films, Inc. et al 3648/2007  
**Subject:** Re: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007

Chill, Victor. I'm just being careful. You'll get your documents.

Sent from my GoodLink synchronized handheld ([www.good.com](http://www.good.com))

-----Original Message-----

**From:** Victor A. Dunlop [[mailto:moreno@sundree.tv](mailto:mailto:moreno@sundree.tv)]  
**Sent:** Friday, December 07, 2007 03:02 PM Eastern Standard Time  
**To:** Stuart Riback  
**Subject:** Re: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007

Stuart:

In my opinion the protective order is not that significant with respect to your client. Bessie advised me that the documents themselves were going out today via Fed Ex, which now appears to not be the case. Time is running and it appears that both, you and LGF are basing the production of documents on the entry of the PO. Note that if by December 14th I have not received documents from both parties, I will request a motion conference on that date for an order compelling both parties to produce all documents and things that we deserve to inspect in order to continue preparing for trial. Thank you for your immediate attention. I look forward to receiving the documents and things.

Regards,  
Victor

On 12/7/07 1:50 PM, "Stuart Riback" <[SRiback@sillerwilk.com](mailto:SRiback@sillerwilk.com)> wrote:

> Let me have a chance to eyeball the protective order again - I haven't  
> had a chance since I last gave comments, but I doubt there will be a  
> problem - and once I sign it I'll send the docs. The docs are on my

> desk. I do apologize, but my post-hearing brief on this preliminary  
> injunctino is going in on Monday, and I have not been able to think  
> about much else. I should be much more accessible next week.  
>  
>  
>  
> -----Original Message-----  
> From: Victor A. Dunlop [mailto:[moreno@sundree.tv](mailto:moreno@sundree.tv)]  
> Sent: Friday, December 07, 2007 1:49 PM  
> To: Stuart Riback  
> Subject: Re: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007  
>  
> Stuart,  
>  
> I spoke with Bessie. I look forward to receiving your responses as well  
> as the documents.  
>  
> Regards,  
> Victor  
>  
>  
> On 12/6/07 8:49 PM, "Stuart Riback" <[SRiback@sillerwilk.com](mailto:SRiback@sillerwilk.com)> wrote:  
>  
>> Victor, I expect to have some stuff for you tomorrow.  
>>  
>> -----Original Message-----  
>> From: Victor A. Dunlop [mailto:[moreno@sundree.tv](mailto:moreno@sundree.tv)]  
>> Sent: Wednesday, December 05, 2007 5:57 PM  
>> To: Tamoshunas, Mark A.; Stuart Riback  
>> Subject: Jones v. Roc-A-Fella Films, Inc. et al 3648/2007  
>>  
>> Dear Mark:  
>>  
>> Please see the attached.  
>>  
>> Regards,  
>> Victor  
>> --  
>> Victor A. Dunlop, Esq.  
>> Dunlop & Associates, P.C.  
>> 55 Washington Street, Suite 451  
>> Brooklyn, New York 11201  
>> (718) 403-9261 Telephone  
>> (614) 455-9261 Facsimile  
>> [www.sundree.tv](http://www.sundree.tv)  
>>  
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>> you are not the addressee, copying, disclosure or other use of this  
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>> [moreno@sundree.tv](mailto:moreno@sundree.tv) and delete the message. Because Internet e-mail and  
>> attachments can be altered electronically, the integrity of this  
>> communication cannot be guaranteed.  
>>  
>  
> --  
> Victor A. Dunlop, Esq.  
> Dunlop & Associates, P.C.  
> 55 Washington Street, Suite 451  
> Brooklyn, New York 11201  
> (718) 403-9261 Telephone  
> (614) 455-9261 Facsimile  
> [www.sundree.tv](http://www.sundree.tv)  
>

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> attachments can be altered electronically, the integrity of this  
> communication cannot be guaranteed.  
>

--

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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----- End of Forwarded Message

# Exhibit 7

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

Mark A. Tamoshunas

Direct Tel: 212-326-0438  
Direct Fax: 212-798-6932  
mtamoshunas@pryorcashman.com

December 10, 2007

**VIA EMAIL**

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street  
Suite 451  
Brooklyn, New York 11201

Re: Antonne M. Jones v. Lions Gate Films, et al.

Dear Victor:

I am writing in response to your letter dated December 5, 2007, which enclosed a signed protective order.

Now that we have received the executed protective order, we will produce Lions Gate's documents as set forth in its document response. Pursuant to our prior agreement, if the protective order is not eventually "so-ordered" by the Court, you will return the documents marked "Attorneys' Eyes Only" and "Confidential."

I expect that we will produce the documents by overnight delivery on Monday, December 17. We will also produce copies to Mr. Riback and Mr. Dash once they have executed the protective order.

Finally, I can confirm your client's deposition for December 20 at our office. We have agreed to commence at 12:00 p.m. and continue until that deposition is completed as you requested.

Very truly yours,



Mark A. Tamoshunas

Enc.

cc: Stuart Riback, Esq., via email  
Damon Dash, via mail



# **Exhibit 8**

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

AMBROSE WOTORSON, P. C.  
SUITE 1811  
26 COURT STREET  
BROOKLYN, N.Y. 11242-1118



**\$0.750**  
US POSTAGE  
FIRST-CLASS  
FROM 10019  
JAN 08 2008

stamps  
com



06260000527191



Damon Dash  
Dash Enterprise 1, LLC  
25 W 39th St Fl 14  
New York NY 10018-3800

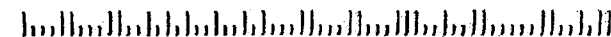


NIXIE 100 DE 1 00 01/16/08

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

BC: 11242111861 \*2109-17209-09-37

1124201118



7  
 1. **DRIVED TO SMOOCH**  
 2. **Forwarding Order Encl...**  
 3. **Hammond, East No Address**  
 4. **Forwarding Order Encl...**

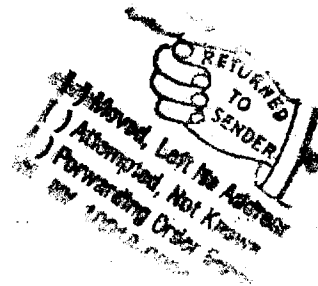
MLN 7A

Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201

**CERTIFIED MAIL™**



9171 8793 2341 8033 0299 96  
RETURN RECEIPT REQUESTED



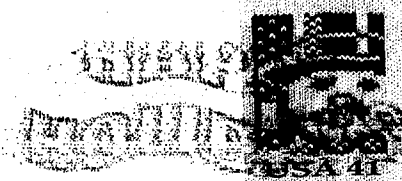
~~Dash Enterprises I, LLC  
Damon Dash, CEO  
25 West 39<sup>th</sup> Street 14<sup>th</sup> Floor  
New York, New York 10018~~

*MCNA  
2/4/08*

Dunlop & Associates, PC  
55 Washington Street, Suite 451  
Brooklyn, NY 11201

NEW YORK NY 100

05 JAN 2008 PM 13 L



Damon Dash  
Dash Enterprises I, LLC  
25 West 39<sup>th</sup> Street 14<sup>th</sup> Floor  
New York, N

NIXIE 100 DC 1 00 01/16/08

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

BC: 11201104501 \*2945-08125-05-22

1001 112011045

1001 112011045

# Exhibit 9

*Law Offices of Ambrose Wotorson, P.C. 26 Court Street, Suite 1811  
Brooklyn, New York 11242*

**From:** Victor A. Dunlop <moreno@sundree.tv>  
**To:** loaww1650@aol.com <loaww1650@aol.com>; Ambrose Wotorson <Wotor1@aol.com>  
**Subject:** FW: Damon Dash contact info  
**Date:** Mon, 4 Feb 2008 4:26 pm

--

Victor A. Dunlop, Esq.  
Dunlop & Associates, P.C.  
55 Washington Street, Suite 451  
Brooklyn, New York 11201  
(718) 403-9261 Telephone  
(614) 455-9261 Facsimile  
[www.sundree.tv](http://www.sundree.tv)

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----- Forwarded Message

**From:** SARA GARRISON <[sara.ddash@gmail.com](mailto:sara.ddash@gmail.com)>  
**Date:** Mon, 4 Feb 2008 16:17:47 -0500  
**To:** <[moreno@sundree.tv](mailto:moreno@sundree.tv)>  
**Subject:** Damon Dash contact info

Victor,

Per Mark Tamoshunas, I am sending you the updated contact information for the offices of Damon Dash. Please find them listed at the bottom of this email. Also, would you mind emailing me the information for the 2/11 conference call?

Thanks,  
Sara Garrison  
Assistant to Damon Dash  
172 Duane St  
NY, NY 10013  
212.334.6528 (o)  
646.705.6538 (m)  
212.334.6579 (f)

----- End of Forwarded Message